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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

DEC 18 2017 EAA

12-18-17

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Keshawn Freeman

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Officer Tankson

Tom Dart (Place Holder)

Case

(To be supplied by the Clerk of this Court)

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

CHECK ONE ONLY:



COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)



COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)



OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

I. Plaintiff(s):

A. Name: Keshawn Freeman  
B. List all aliases: Tavon Freeman, Kejuan Boyd  
C. Prisoner identification number: # 20170315205  
D. Place of present confinement: Cook County Dept of Corrections  
E. Address: P.O. Box 089002

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

A. Defendant: Tankson  
Title: Officer  
Place of Employment: Cook County Dept of Corrections  
B. Defendant: Tom Dart  
Title: Cook County Sheriff  
Place of Employment: State of Illinois  
C. Defendant: \_\_\_\_\_  
Title: \_\_\_\_\_  
Place of Employment: \_\_\_\_\_

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

A. Name of case and docket number: N/A

B. Approximate date of filing lawsuit: N/A

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: N/A

D. List all defendants: N/A

E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): N/A

F. Name of judge to whom case was assigned: N/A

G. Basic claim made: N/A

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): N/A

I. Approximate date of disposition: N/A

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

**IV. Statement of Claim:**

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

on the date of 8-2-17 around 11:00AM to 12:00pm during 1st shift  
Division 11. I was called from my tier CA for a call Pass to the  
dentist. Officer Tankson was the officer escorting me to the  
dentist which is apart of the speccery. I was sad because one  
of my uncles were on the tier housed with me, but he was moved  
to a different tier and attacked and stabbed by different detainees.  
I had a frown and sad look on my face, so officer Tankson asked me  
why I was frowning? I told Officer Tankson what I was going through  
and what had happened to my uncle. Officer Tankson replied by saying  
your uncle should've stayed with your ass then. I know your uncle  
he's a clown. I asked Officer Tankson to stop playing with me?  
Officer Tankson replied back to me upset stating what the fuck did  
you just say to me? I then repeated myself stating I said stop  
playing with me and I added I'm not your child, your child is at home.  
He turned around and got and my face then started pounching me in my  
face repeatedly with his fist. Officer Ms Dixon and another officer  
(unknown) to me pulled / <sup>Grabbed</sup> Officer Tankson from OFF of me and  
stopped Officer Tankson from continuing to attack me by pounching me —

in my face. I was seen by the Nurses in the Spencery for my injuries that Officer Tankson gave me. I suffered trauma to my left eye, and a busted lip from Officer Tankson attacking me. The nurses from the health care spencery, sent me to Cermak. I almost lost Conscious. After I came from Cermak I was put in holding transferred and [redacted] to Division 10 for no reason at all. I was the victim in the whole situation. I was attacked by Officer Tankson a Cook County Correctional official. I was attacked right in front of the health care spencery. The Cameras in Division 11 near the spencery on the 1st Floor Caught the Officer attacking me. I exsauted all my grievence. Remedies like I was suppose to do Officer Tankson had no reason to attack me. I was a threat to any officers or showed no type of [redacted] to anyone. There was no reason for Officer Tankson [redacted] physical behavior toward me, or his [redacted] misconduct of assualted me. When Officer Tankson is suppose to be protecting me. my Rights have been violated and there is no Justification of officer Tankson actions. No detainee should be attacked by any officers in any jail in Cluding the Dept of Corrections (Cook County).

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V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I will like my Filing fees paid for by the Cook County Dept of Correctional. With Compensation of \$20,000.00 and Officer Tankson fired from his duty as an Correctional officer.

VI. The plaintiff demands that the case be tried by a jury.  YES  NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_

Keyshawn Freeman  
(Signature of plaintiff or plaintiffs)

Keyshawn Freeman  
(Print name)

20170315205  
(I.D. Number)

Cook County Dept of Corrections

Po Box 089002

Chicago, IL 60608  
(Address)

Weshaun Freeman  
ID#20170315105

P.O. Box 089002

Chicago IL 60608

1:17cv09126

Judge: Gary Feinerman  
Magistrate Judge Jeffrey T. Gilbert  
PC 7

Prisoner correspondent  
United States District Court  
219 S. Dearborn Street 20th Floor  
Chicago, IL 60604

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